

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**VENTURIST, INC.,**

**PLAINTIFF,**

**VS.**

**PAT MAUNEY,**

**DEFENDANT.**

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**CIVIL ACTION NO. 2:06cv494-SRW**

**UNOPPOSED MOTION FOR PROTECTIVE ORDER**

COMES NOW, the plaintiff, Venturist, Inc., and submits the following Unopposed Motion for Protective Order. As grounds for this Motion, plaintiff would show as follows:

Discovery in the present case may require the disclosure of confidential information, relating to both parties, which neither party wants disseminated to the public. In recognition thereof, the parties hereby stipulate to the attached proposed Protective Order regarding the designation and use of confidential material, documents, or other information in this litigation. Accordingly, the plaintiff respectfully requests this Honorable Court grant its Unopposed Motion and enter a Protective Order regarding confidential information in this case.

Respectfully Submitted,

/s/ Emily C. Marks  
EMILY C. MARKS  
Attorney for Plaintiff Venturist, Inc.

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2006, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered:

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/s/ Emily C. Marks  
OF COUNSEL